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*Attorneys for Defendant Crumbl, LLC*

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**UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DISTRICT**

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ATLANTIC RECORDING  
CORPORATION, ATLANTIC RECORDS  
GROUP LLC, BAD BOY RECORDS LLC,  
BIG BEAT RECORDS INC., ELEKTRA  
ENTERTAINMENT GROUP, INC.,  
ELEKTRA ENTERTAINMENT LLC,  
RHINO ENTERTAINMENT LLC,  
WARNER MUSIC INTERNATIONAL  
SERVICES LIMITED, WARNER  
RECORDS INC., UNICHAPPELL MUSIC  
INC., W CHAPPELL MUSIC CORP.,  
WARNER CHAPPELL MUSIC, INC., and  
WARNER-TAMERLANE PUBLISHING,  
CORP.,

Plaintiffs,

vs.

CRUMBL, LLC, a Utah Limited Liability  
Company, and DOES 1 through 10, inclusive,

Defendants.

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**STIPULATED MOTION PURSUANT TO  
FED. R. CIV. P. 6(b) TO EXTEND TIME  
TO ANSWER OR OTHERWISE PLEAD**

Case No. 2:25-cv-00316-HCN

District Judge Howard C. Nielson, Jr.

Magistrate Judge Cecilia M. Romero

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Pursuant to Fed. R. Civ. P. 6(b)(1), Defendant Crumbl, LLC (hereinafter “Crumbl” or “Defendant”) and Plaintiffs Atlantic Recording Corporation, Atlantic Records Group LLC, Bad Boy Records LLC, Big Beat Records Inc, Elektra Entertainment Group, Inc., Elektra Entertainment LLC, Rhino Entertainment LLC, Warner Music International Services Limited, Warner Records Inc., Unichappell Music Inc., W Chappell Music Corp., Warner Chappell Music, Inc., and Warner-Tamerlane Publishing, Corp. (hereinafter “Plaintiffs”), by and through their respective counsel, hereby stipulate and agree to extend the time for Defendant to answer or otherwise respond to Plaintiffs’ Complaint by 30 days, to July 30, 2025, and in support state:

1. Crumbl requests an additional 30 days to properly respond to Plaintiffs’ Complaint. This is the second such extension.

2. Plaintiffs filed their Complaint on April 22, 2025. (Dkt. No. 1.) On April 24, 2025, Crumbl, through prior counsel, accepted service of the Summons and Complaint. (Dkt. No. 9.) On May 15, and in response to the parties’ stipulation, the Court extended Crumbl’s response deadline from May 15 to June 30. A further extension of 30 days would extend the responsive pleading deadline to July 30, 2025.

3. Rule 6(b) allows for extension of time as to “[w]hen an act may or must be done” upon a showing of “good cause ... if a request is made[] before the original time” to respond. Good cause “often [] means little more than that there is a good reason for the action proposed to be taken.” *U.S. v. Real Property located at (Redacted) Layton, Utah 84040*, No. 1:07-CV-6-TS, 2010 WL 2787859, at \*2 (D. Utah July 14, 2010) (citation omitted). “This liberal standard is met by a mere showing of good faith or lack of prejudice to the adverse party.” *Id.* (citation omitted).

4. There is good cause for its stipulated request. Crumbl and its counsel are continuing to investigate the allegations made against Crumbl as well as assessing the claims against Crumbl and its defenses.

5. This motion is timely made, and the additional time sought by Crumbl is not intended to and will not unreasonably delay this matter or cause any prejudice to Plaintiffs.

6. Counsel for Crumbl and counsel for Plaintiffs have conferred regarding this extension. Plaintiffs stipulate to Crumbl's request. A proposed order is submitted concurrently herewith.

Dated: June 30, 2025

Respectfully submitted,

/s/ Chris Mack

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*Attorneys for Defendant Crumbl, LLC*

Approved:

SIDLEY AUSTIN

/s/ Ryan C. Morris  
(with permission given via email on 6/30/25)

**CERTIFICATE OF SERVICE**

I hereby certify that on this June 30, 2025, I caused a true and correct copy of the foregoing document to be electronically filed in the CM/ECF system, which will effectuated service on all counsel of record deemed to have consented to electronic service. All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing document by email on this day.

/s/

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Executive Assistant